### COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986) Warren A. Usatine, Esq. (NJ Bar No. 025881995) Court Plaza North, 25 Main Street Hackensack, New Jersey 07601 (201) 489-3000 msirota@coleschotz.com wusatine@coleschotz.com

## KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (pro hac vice pending) Christine A. Okike, P.C. (pro hac vice pending) 601 Lexington Avenue New York, New York 10022 (212) 446-4800 jsussberg@kirkland.com christine.okike@kirkland.com

Proposed Attorneys for Debtors and Debtors in Possession

# HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Kenric D. Kattner, Esq. (*pro hac vice* pending) 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 659-7300 richard.kanowitz@haynesboone.com kenric.kattner@haynesboone.com

Proposed Attorneys for Debtors and Debtors in Possession

# UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re: Chapter 11 BLOCKFI INC., *et al.*,

Debtors.<sup>1</sup> Case No. 22-19361 (MBK)

Jointly Administered

# NOTICE OF HEARING

PLEASE TAKE NOTICE that a final hearing (the "Second Day Hearing") on the following motions and applications (collectively, the "First Day Motions") has been scheduled to take place before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, on Monday, January 9, 2023 at 10:00 a.m. (ET) or as soon thereafter as counsel may be heard:

1. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to File a Consolidated List of Top 50 Unsecured Creditors and Consolidated List of Creditors, (II) Authorizing the Debtors to Redact Certain Personally Identifiable Information of Individual Creditors, Clients, Equity Holders, and Current and Former Employees, (III) Authorizing Client Name Redaction, (IV) Waiving the

<sup>&</sup>lt;sup>1</sup> The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

- Requirement to File an Equity List and Provide Notices Directly to Equity Security Holders and (V) Granting Related Relief [Docket No. 4];
- 2. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue Use of Existing Business Forms and Records, (B) Maintain Existing Corporate Bank Accounts and Cash Management System, (C) Pay Prepetition Bank Fees Associated with the Cash Management System, and (D) Continue Performance of Intercompany Transactions, (II) Granting Superpriority Administrative Expense Status to Postpetition Intercompany Balances, and (III) Waiving Certain U.S. Trustee Requirements [Docket No. 7];
- 3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Taxes and Fees and (II) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers Pursuant to Bankruptcy Code §§ 105(a), 363(b), 507(a)(8), and 541(d) [Docket No. 9];
- 4. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Companies from Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Assurance of Payment [Docket No. 10];
- 5. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 363(c) Authorizing the Debtors to (I) Continue, Renew, or Supplement Insurance Policies, (II) Pay Insurance Premiums and Related Obligations Thereon, (III) Continue, Renew, or Supplement the Surety Bond Program, and (IV) Granting Related Relief [Docket No. 11];
- 6. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Claimants and (II) Granting Related Relief [Docket No. 13];
- 7. Debtors' Motion for Entry of Interim and Final Orders (I) Approving Notification and Hearing Procedures for Certain Transfers of and Declarations of Worthlessness with Respect to Common Stock and Preferred Stock and (II) Granting Related Relief [Docket No. 14]; and
- 8. Debtors' Motion for Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Expenses, and (B) Continue Employee Benefits Programs, and (II) Granting Related Relief [Docket No. 16].

Copies of the First Day Motions are available on the Debtor's claims and noticing agent website at https://restructuring.ra.kroll.com/blockfi.

PLEASE TAKE FURTHER NOTICE that a hearing on the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Retention Programs and (II) Granting Related Relief

[Docket No. 21] (the "<u>KERP Motion</u>") shall take place before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the same time as the Second Day Hearing (i.e. on <u>Monday</u>, <u>January 9, 2023 at 10:00 a.m. (ET))</u> or as soon thereafter as counsel may be heard. Copies of the KERP Motion are available on the Debtor's claims and noticing agent website at <a href="https://restructuring.ra.kroll.com/blockfi">https://restructuring.ra.kroll.com/blockfi</a>.

PLEASE TAKE FURTHER NOTICE that Objections, if any, to the relief requested in the First Day Motions and/or the KERP Motion shall: (a) be in writing; (b) state with particularity the basis of the objection; and (c) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the "General Order") and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the "Supplemental Commentary") (the General Order, the Supplemental Commentary and the User's Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received by the Debtors' proposed counsel on or before January 2, 2023 at 4:00 p.m. (ET).

**PLEASE TAKE FURTHER NOTICE** that, if no objections are timely filed and served, pursuant to D.N.J. LBR 9013-3(d), the Court may enter an order approving the relief requested on a final basis without further notice or hearing.

[Remainder of page left intentionally blank.]

**PLEASE TAKE FURTHER NOTICE** that any parties wishing to participate in the Second Day Hearing via Zoom for Government must consult Judge Kaplan's website, <a href="http://www.njb.uscourts.gov/BlockFi">http://www.njb.uscourts.gov/BlockFi</a>, for instructions on how to attend this hearing.

Dated: December 1, 2022

Respectfully Submitted, /s/ *Michael D. Sirota* 

### COLE SCHOTZ P.C.

Michael D. Sirota, Esq. (NJ Bar No. 014321986) Warren A. Usatine, Esq. (NJ Bar No. 025881995) Court Plaza North, 25 Main Street Hackensack, New Jersey 07601 (201) 489-3000 msirota@coleschotz.com wusatine@coleschotz.com

# KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (pro hac vice pending) Christine A. Okike, P.C. (pro hac vice pending) 601 Lexington Avenue New York, New York 10022 (212) 446-4800 jsussberg@kirkland.com christine.okike@kirkland.com

## HAYNES AND BOONE, LLP

Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Kenric D. Kattner, Esq. (*pro hac vice* pending) 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 659-7300 richard.kanowitz@haynesboone.com kenric.kattner@haynesboone.com

Proposed Attorneys for Debtors and Debtors in Possession